

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION**

MUELLER BRASS CO.,

Plaintiff,

vs.

No. 2:20-cv-02496-SHL-cgc

DAVID CROMPTON,

Defendant.

MUELLER BRASS CO.'S MOTION TO COMPEL

Plaintiff/Counter-Defendant Mueller Brass Co. ("Mueller Brass"), by and through undersigned counsel and pursuant to Fed. R. Civ. P. 26 and 37, files this Motion to Compel Defendant David Crompton ("Crompton") to respond to certain of Mueller Brass' written discovery requests. For the reasons stated herein and in Mueller Brass' Memorandum of Law in Support, filed contemporaneously herewith, Mueller Brass moves the Court as follows:

1. To compel Crompton to fully and completely respond to Mueller Brass' Interrogatory Nos. 12 through 15, and provide the information requested therein.
2. To compel Crompton to produce the documents requested in Mueller Brass' Request Nos. 9 through 13.
3. To order Crompton to reimburse Mueller Brass for its attorneys' fees and costs associated with bringing and prosecuting this Motion.

WHEREFORE, PREMISES CONSIDERED, Mueller Brass Co. moves the Court to compel Crompton to respond to Mueller Brass' written discovery requests as set forth above and provide all information and documents requested therein within 14 days of a ruling on this Motion.

Mueller Brass further moves the Court for an award of its reasonable attorneys' fees and expenses associated with bringing this Motion.

Respectfully submitted,

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Attorneys for Plaintiff, Mueller Brass Co.

CERTIFICATE OF CONSULTATION

On September 2, 2021, counsel for Mueller Brass emailed a letter to Crompton's counsel, outlining Mueller Brass' request for supplementation of the discovery requests at issue in this Motion. Mueller Brass advised that: if Crompton would not agree to answer the subject interrogatories and requests for production of documents, if no agreement or compromise was reached, or if Crompton otherwise failed to respond by close of business on September 3, 2021, Mueller Brass would proceed to file its Motion to Compel. On September 3, 2021, counsel for Crompton responded and indicated that the Crompton's objection to producing the requested financial information stands.

/s/ Aubrey B. Greer

Aubrey B. Greer

CERTIFICATE OF SERVICE

I hereby certify that on September 3, 2021, a copy of the foregoing was served on the parties listed below via the Court's ECF System and via e-mail and/or United States Mail, postage prepaid:

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